

September 15, 2016

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Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia SC 29210

Re: Application of Atlantic Broadband Enterprises, LLC for a Certificate of  
Public Convenience and Necessity to Provide Facilities-Based Local  
Exchange and Resold Long Distance Telecommunications Services  
within the State of South Carolina  
Docket No. 2016-321-C

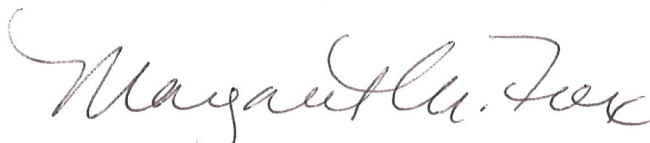
Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone  
Coalition (the "Coalition"), a Petition to Intervene in the above-referenced  
docket. By copy of this letter and Certificate of Service all parties of record will  
receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosure: as stated

McNAIR LAW FIRM, P.A.  
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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2016-321-C

Re:   Application of Atlantic Broadband       )  
      Enterprises, LLC for a Certificate of    )  
      Public Service Convenience and        )  
      Necessity to Provide Facilities-Based   )  
      Local Exchange and Resold Long        )  
      Distance Telecommunications           )  
      Services within the State of South      )  
      Carolina                                    )

**PETITION TO INTERVENE**

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In response to the Commission's Notice of Filing of the Application of Atlantic Broadband Enterprises, LLC ("Atlantic Broadband") for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1.       SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2.       SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.


3.       SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
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By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

September 15, 2016

Columbia, South Carolina

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2016-321-C

Re:    Application of Atlantic Broadband    )  
      Enterprises, LLC for a Certificate of    )  
      Public Service Convenience and        )  
      Necessity to Provide Facilities-Based    )  
      Local Exchange and Resold Long        )  
      Distance Telecommunications           )  
      Services within the State of South       )  
      Carolina                                    )

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**CERTIFICATE OF SERVICE**

I, Kathy Handrock, Paralegal for McNair Law Firm, P.A., do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
PO Box 944  
Columbia, SC 29202

Andrew M. Bateman, Esquire  
Jenny R. Pittman  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201



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